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Federal Communications Commission
Office of the Secretary
445 12th St., SW, Room TW-A325
Washington, DC 20554

May 20, 2017

Re: CAF II Challenge

To Whom It May Concern:

In June of 2014 the FCC announced the availability of CAF II Funds for multiple Census Blocks (CBs) in Trinity, Humboldt and Shasta Counties of California, however at that time the FCC already had data available to it demonstrating Velocity's service of 6/1.5 Mbps in these areas, which exceeded the threshold of 4/1 Mbps. These CBs are contained in the attached spreadsheet.

Furthermore, Velocity did not receive any notice from the FCC that these funds had been made available. This did not offer Velocity an opportunity to challenge the CAF II award. It was not until a recent grant project came before the California Public Utilities Commission that Velocity became aware of Verizon's receipt of CAF II funds which were subsequently transferred to Frontier.

Verizon should not have been awarded these funds since the FCC already had data showing Velocity provided service above the 4/1 Mbps threshold as evidenced on the National Broadband Map (www.broadbandmap.gov) which dates back to June 2014. Furthermore, in the time since the CAF II funds were awarded, Velocity has upgraded its fixed wireless network to be able to carry speeds of 10/1.5 Mbps, which exceeds the service level proposed by Frontier. Velocity also offers speeds of 30/3 Mbps on its cable system in the town of Weaverville, CA, which far exceeds service proposed by Frontier. For these reasons, the CBs in the attached spreadsheet should be reclassified from "unserved" to "served" and CAF II funding to Frontier for these CBs should be immediately retracted.

Respectfully,

Travis Finch
Chief Executive Officer
Velocity Communications, Inc.